

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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In re:

CITY OF DETROIT, MICHIGAN,

Debtor.

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)  
) Chapter 9  
)  
) Case No. 13-53846  
)  
) Hon. Steven W. Rhodes  
)

**APPELLANTS' DESIGNATION OF ITEMS TO BE INCLUDED  
IN THE RECORD ON APPEAL**

Pursuant to Rule 8006 of the Federal Rules of Bankruptcy Procedure, appellants the Michigan Council 25 of the American Federation of State, County & Municipal Employees, AFL-CIO and Sub-Chapter 98, City of Detroit Retirees (collectively, "**AFSCME**" or the "**Appellants**"), respectfully submit this designation of items for inclusion in the record on appeal in connection with AFSCME's appeal [Docket Nos. 1907, 1956] (the "**Appeal**") from the bankruptcy court's (i) decision, announced from the bench on December 3, 2013, finding the City of Detroit, Michigan eligible for relief under chapter 9 of the Bankruptcy Code (the "**Bench Decision**"); (ii) Order for Relief Under Chapter 9 of the Bankruptcy Code, dated December 5, 2013 finding the City of Detroit, Michigan eligible for relief under chapter 9 of the Bankruptcy Code [Docket No. 1946] (the "**Order for Relief**"); and (iii) accompanying Opinion Regarding Eligibility, dated December 5, 2013 [Docket No. 1945] (the "**Opinion**," together with the Bench Decision and Order for Relief, are collectively the "**Eligibility Order**").

**Designation of Items for the Record**

The Appellants hereby designate the following items, together with all exhibits, schedules and other attachments thereto (whether or not explicitly listed below), for inclusion in the record of the Appeal of the Eligibility Order:

<b>Item No. (Attached)</b>	<b>Docket No./ Trial Exhibit No.</b>	<b>Date of Filing/Entry</b>	<b>Description</b>
1.	481	8/19/13	Attorney General Bill Schuette's Statement Regarding the Michigan Constitution and the Bankruptcy of the City of Detroit
2.	509	8/19/13	Declaration of Steven Kreisberg (including Exhibit C attached thereto, "June 14, 2013 City of Detroit Proposal for Creditors")
3.	765	9/6/13	City of Detroit's Consolidated Reply to Objections to the Entry of an Order for Relief
4.	1156	10/11/13	The Michigan Council 25 of the American Federation of State, County & Municipal Employees, AFL-CIO and Sub-Chapter 98, City of Detroit Retirees' Amended Objection to the City of Detroit's Eligibility to Obtain Relief Under Chapter 9 of the Bankruptcy Code
5.	1159	10/11/13	Declaration of Michael Artz
6.	1162	10/11/13	Declaration of Steven Kreisberg
7.	1217	10/17/13	Order Regarding Further Briefing on Eligibility
8.	1227	10/17/13	The Michigan Council 25 of the American Federation of State, County & Municipal Employees, AFL-CIO and Sub-Chapter 98, City of Detroit Retirees' Pretrial Brief Regarding the City of Detroit's Eligibility to Obtain Relief Under Chapter 9 of the Bankruptcy Code
9.	1228	10/17/13	Supplemental Declaration of Michael Artz
10.	1353	10/24/13	Notice Regarding Briefing on "Good Faith Negotiations"
11.	1467	10/30/13	AFSCME's Supplemental Brief Regarding Eligibility
12.	1556	11/6/13	City of Detroit's Supplemental Brief in Support of Entry of an Order for Relief
13.	1945	12/5/13	Opinion Regarding Eligibility
14.	1946	12/5/13	Order for Relief Under Chapter 9 of the Bankruptcy Code
15.	1984	12/9/13	Transcript Order Form of Hearing on October 15, 2013 Filed by Creditor Michigan Council 25 Of The American

			Federation of State, County & Municipal Employees, AFL-CIO and Sub-Chapter 98, City of Detroit Retirees
16.	1985	12/9/13	Transcript Order Form of Hearing on October 16, 2013 Filed by Creditor Michigan Council 25 Of The American Federation of State, County & Municipal Employees, AFL-CIO and Sub-Chapter 98, City of Detroit Retirees
17.	1986	12/9/13	Transcript Order Form of Hearing on October 21, 2013 Filed by Creditor Michigan Council 25 Of The American Federation of State, County & Municipal Employees, AFL-CIO and Sub-Chapter 98, City of Detroit Retirees
18.	1987	12/9/13	Transcript Order Form of Hearing on October 23, 2013 Filed by Creditor Michigan Council 25 Of The American Federation of State, County & Municipal Employees, AFL-CIO and Sub-Chapter 98, City of Detroit Retirees
19.	1988	12/9/13	Transcript Order Form of Hearing on October 24, 2013 Filed by Creditor Michigan Council 25 Of The American Federation of State, County & Municipal Employees, AFL-CIO and Sub-Chapter 98, City of Detroit Retirees
20.	1989	12/9/13	Transcript Order Form of Hearing on October 25, 2013 Filed by Creditor Michigan Council 25 Of The American Federation of State, County & Municipal Employees, AFL-CIO and Sub-Chapter 98, City of Detroit Retirees
21.	1990	12/9/13	Transcript Order Form of Hearing on October 28, 2013 Filed by Creditor Michigan Council 25 Of The American Federation of State, County & Municipal Employees, AFL-CIO and Sub-Chapter 98, City of Detroit Retirees
22.	1991	12/9/13	Transcript Order Form of Hearing on October 29, 2013 Filed by Creditor Michigan Council 25 Of The American Federation of State, County & Municipal Employees, AFL-CIO and Sub-Chapter 98, City of Detroit Retirees

23.	1992	12/9/13	Transcript Order Form of Hearing on November 4, 2013 Filed by Creditor Michigan Council 25 Of The American Federation of State, County & Municipal Employees, AFL-CIO and Sub-Chapter 98, City of Detroit Retirees
24.	1993	12/9/13	Transcript Order Form of Hearing on November 5, 2013 Filed by Creditor Michigan Council 25 Of The American Federation of State, County & Municipal Employees, AFL-CIO and Sub-Chapter 98, City of Detroit Retirees
25.	1995	12/9/13	Transcript Order Form of Hearing on November 7, 2013 Filed by Creditor Michigan Council 25 Of The American Federation of State, County & Municipal Employees, AFL-CIO and Sub-Chapter 98, City of Detroit Retirees
26.	1996	12/9/13	Transcript Order Form of Hearing on November 8, 2013 Filed by Creditor Michigan Council 25 Of The American Federation of State, County & Municipal Employees, AFL-CIO and Sub-Chapter 98, City of Detroit Retirees
27.	1997	12/9/13	Transcript Order Form of Hearing on December 3, 2013 Filed by Creditor Michigan Council 25 Of The American Federation of State, County & Municipal Employees, AFL-CIO and Sub-Chapter 98, City of Detroit Retirees
28.	All Admitted Trial Exhibits, including but not limited to the Admitted Trial Exhibits listed below <sup>1</sup>	N/A	
29.	Trial Exhibit 29	7/18/13	Letter from Governor Snyder re: Authorization to Commence Chapter 9 Bankruptcy Proceeding
30.	Trial Exhibit 43	6/14/13	City of Detroit Proposal for Creditors

<sup>1</sup> A list of admitted Trial Exhibits is contained at Docket Nos. 1356 and 1800. Pursuant to instructions from the Bankruptcy Clerk's office, Trial Exhibits are not being attached to this designation, rather will be delivered only at the request of the District Court.

31.	Trial Exhibit 44	6/14/13	City of Detroit Proposal for Creditors Executive Summary
32.	Trial Exhibit 402	1/31/13	E-mail from D. Moss to K. Orr
33.	Trial Exhibit 403	1/31/13	E-mail from K. Orr to C. Ball
34.	Trial Exhibit 414	7/18/13	Declaration of Kevyn D. Orr in Support of City of Detroit, Michigan's Statement of Qualifications Pursuant to Section 109(c) of the Bankruptcy Code
35.	Trial Exhibit 833	1/29/13	Jones Day Presentation to the City of Detroit
36.	Trial Exhibit 844	6/5/12	E-mail from T. Wilson to H. Lennox
37.	Trial Exhibit 846	3/2/12	E-mail from J. Ellman to C. Ball
38.	Trial Exhibit 847	12/7/12	E-mail from J. Ellman to C. Ball
39.	Trial Exhibit 851	3/24/12	E-mail from J. Ellman to K. Herman
40.	Trial Exhibit 860	1/28/13	E-mail from C. Ball to J. Ellman

Dated: December 19, 2013

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